

43:10-15 Relevance as to Timeframe
47:9-20 Relevance as to Timeframe
56:23-57:4 Relevance as to Timeframe
57:19-58-9 Hearsay
60:17-61:8 Hearsay
64:3-22 Hearsay
65:7-11 Hearsay

Deposition of James Goldsmith (objected-to portions attached as Exhibit C)

189:7-24 Incomplete
194:11 Incomplete
215:5-13 Improper Partial Waiver of Privilege (see 215:14-217:24)
241:24-242:20 Lacks Foundation
244:12-24 Lacks Foundation

Deposition of James Goldsmith / Gator Representative (objected-to portions attached as Exhibit D)

148:11-18 Non-Responsive, Relevance
156:13-24 Non-Responsive, Relevance
294:1-11 Incomplete

Counter-Counter-Designations

By way of counter-counter-designations in response to Gator's counter-designations, 58 Swansea incorporates by reference its own deposition designations filed January 19, 2018 and its own counter-designations filed January 24, 2018, and provides additional counter-counter-designations as follows:

Deposition of Robert Richmond / Wakefern Representative

47:23-48:3

Deposition of James Goldsmith

194:12-22
195:6-202:13
203:12-24
236:6-239:15
247:1-11

Deposition of James Goldsmith / Gator Representative

157:9-13
294:12-295:4
295:22-298:16

Respectfully submitted,
58 SWANSEA MALL DRIVE, LLC

By his attorney,

Dated: January 26, 2017

/s/ Peter J. Duffy
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 26, 2018.

/s/ Peter J. Duffy
Peter J. Duffy (BBO # 566682)